

# UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

Rupert Crossley, Alvin Leacock, Eric Vick,  
Anthony Trotman, and Dino Dunkley,

Case No.

14-mj-5063-JCB

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Aug. 6, 2012 - Feb. 12, 2014 in the county of Suffolk in the  
       District of Massachusetts, the defendant(s) violated:

*Code Section*

*Offense Description*

Title 18, U.S.C., Section 1956(h)  
Title 18, U.S.C., Section 371

Conspiracy to Commit Money Laundering  
Conspiracy to Defraud the United States (the TSA)

See Attachment A

This criminal complaint is based on these facts:

See Attachment B - Affidavit of Special Agent Stephen Valentine in Support of Criminal Complaint.

☒ Continued on the attached sheet.



*Complainant's signature*

Stephen Valentine, Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 05/27/2014



*Judge's signature*

City and state: Boston, MA

Judith G. Dein, U.S. Magistrate Judge

*Printed name and title*

## **ATTACHMENT A**

### **OFFENSE DESCRIPTION**

**18 U.S.C. § 1956(h) (Money Laundering Conspiracy)**, provides in part:

Any person who conspires to commit any offense in this section or section 1957 shall be subject to the same penalties as those prescribed for the offense the commission of which was the object of the conspiracy.

**18 U.S.C. § 1956(a)(3)(A) & (B) (Money Laundering)**, provides in part:

Whoever, with the intent – (A) to promote the carrying on of specified unlawful activity; [or] (B) to conceal or disguise the nature, location, source, ownership, or control of property believed to be the proceeds of specified unlawful activity ... conducts or attempts to conduct a financial transaction involving property represented to be the proceeds of specified unlawful activity, or property used to conduct or facilitate specified unlawful activity, shall be [in violation of this section].

**18 U.S.C. § 371 (Conspiracy to Defraud United States)**, provides in part:

If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be [in violation of this section].

**49 U.S.C. § 46314(a) and (b)(2) (Entering Aircraft or Airport Area in Violation of Security Requirements)**, provides in part:

(a) A person may not knowingly and willfully enter, in violation of security requirements prescribed under section 44901 ... of this title, an aircraft or an airport area that serves an air carrier or foreign air carrier.

(b)(2) A person violating subsection (a) of this section with intent to evade security procedures or restrictions or with intent to commit, in the aircraft or airport area, a felony under law of the United States ... shall be [in violation of this section].

**49 U.S.C. § 44901(a) (Screening Passengers and Property)**, provides in part:

(a) The [TSA] shall provide for the screening of all passengers and property, including ... cargo, carry-on and checked baggage, and other articles, that will be carried aboard a passenger aircraft operated by an air carrier .... In the case of flights ... originating in the United States, the screening shall take place before boarding and shall be carried out by a Federal Government employee[.]

## **ATTACHMENT B**

### **AFFIDAVIT OF SPECIAL AGENT STEPHEN VALENTINE IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Stephen Valentine, having been duly sworn, hereby depose and state as follows:

#### **AGENT BACKGROUND**

1. I am a Special Agent with the Homeland Security Investigations (“HSI”) Boston Field Office of the U.S. Department of Homeland Security (“DHS”) and I am assigned to Boston Logan International Airport (“Logan”). I have approximately thirteen years of law enforcement experience during which I have received specialized training regarding the activities of narcotics traffickers, including the methods used to distribute and import controlled substances, as well as the methods used by drug trafficking organizations to launder and smuggle illicit narcotics proceeds. I have also received training with respect to airport screening and security procedures, and I am familiar with the Transportation Security Administration (“TSA”) safety regulations and protocols.

#### **INTRODUCTION**

##### ***A. Purpose of the Affidavit***

2. I have participated in an investigation of federal criminal violations by Rupert CROSSLEY (“CROSSLEY”), Alvin LEACOCK (“LEACOCK”), Eric VICK (“VICK”), Anthony TROTMAN (“TROTMAN”), and Dino DUNKLEY (“DUNKLEY”) (collectively, the “DEFENDANTS” or “CO-CONSPIRATORS”) as set forth in this affidavit. I submit this affidavit in support of a criminal complaint charging the DEFENDANTS with (i) conspiracy to commit money laundering, in violation of 18 U.S.C. §§ 1956(h) and 1956(a)(3)(A) and (B); and (ii) conspiracy to defraud the United States, namely, the TSA, by entering an airport area with the intent to evade TSA security procedures, and with the intent to commit, in the airport area, a felony, in violation of 18 U.S.C. § 371 and 49 U.S.C. §§ 46314(a) and (b)(2).

3. This affidavit is submitted for the limited purpose of establishing probable cause that the DEFENDANTS committed the above violations. Therefore, I have not included every detail of this investigation. The foregoing facts are based upon my participation in this investigation, my review of reports by other law enforcement officers, physical surveillance, information from a cooperating witness (“CW”), my review of public records, database checks and other investigative sources. All conversations referred to herein are based upon consensual recordings unless otherwise indicated.

***B. Background of the DEFENDANTS and the CW***

4. At all times relevant to this complaint, CROSSLEY, LEACOCK, VICK and TROTMAN were Ground Operations Crew Members for JetBlue Airways (“JetBlue”), and DUNKLEY was a Customer Service Ramp Agent for Delta Air Lines (“Delta”). As Ground Operations Crew Members and as a Customer Service Ramp Agent, the DEFENDANTS were authorized to access secure airport areas at Logan. Specifically, by virtue of their respective positions at JetBlue and Delta, the DEFENDANTS each possessed MassPort security badges, personal identification codes, and biometric fingerprint clearances that permitted the DEFENDANTS to enter through unmanned security doors that led to certain restricted locations and secure airport areas of Logan.

5. The CW is a former airline employee, who previously had access to secure airport areas at Logan. Based upon the CW’s prior experience as an airline employee at Logan, the CW informed HSI that the CW believed that other airline employees at Logan had abused their TSA security clearance for illegal or improper purposes. The CW, a foreign national with a prior felony drug conviction, has cooperated on prior investigations with the government, and has provided accurate, reliable, and corroborated information to law enforcement in the past. The CW has continued to cooperate with the government as consideration for favorable immigration

status. Under the direction of HSI, the CW represented himself to the DEFENDANTS as a member of a drug trafficking organization, who was responsible for smuggling illicit cash proceeds derived from drug trafficking in the Boston area and elsewhere to other locations in and outside the United States. The CW represented to the DEFENDANTS that the CW's drug trafficking organization needed the assistance of airport employees to smuggle cash drug proceeds through TSA security area checkpoints, so that the CW could then transport such cash proceeds from Boston to Florida without TSA detection.

***C. Logan and the TSA***

6. Logan is located in East Boston, Massachusetts. At Logan, TSA is charged with, among other things, the responsibility of ensuring passenger safety and national security by enforcing the aviation transportation laws of the United States. Accordingly, TSA agents screen all passengers, baggage and other articles to be carried into an airport area that serves air carriers and aboard a passenger aircraft, and to further assure the security and safety of passengers and aircraft.

7. TSA security procedures require the inspection of all passengers entering the secure area of Logan and entering an aircraft at Logan. These procedures mandate that passengers place their carry-on belongings into an x-ray machine and that passengers walk through metal detectors and/or body scan machines. Once passengers and their belongings are cleared by TSA agents, passengers are allowed to proceed to the secure passenger gate area. If any contraband or abnormality is detected during the screening process, the passenger is subjected to a TSA secondary inspection, which involves a more thorough search of the passenger and the passenger's carry-on bags and other articles.

### **THE OBJECT OF THE CONSPIRACY**

8. From in or about August 2012 through in or about February 2014, HSI conducted an investigation into airport security at Logan after the CW informed HSI that a JetBlue employee (later determined to be CROSSLEY) offered to assist the CW in smuggling what the CW represented to be illicit drug cash proceeds through secure airport areas at Logan, in exchange for a cash fee. During the course of the investigation, CROSSLEY agreed to recruit another JetBlue employee, later identified as LEACOCK, in order to further evade TSA detection, and to assist in the cash smuggling scheme. LEACOCK later recruited VICK, as an additional JetBlue employee to join the cash smuggling scheme. VICK subsequently agreed to recruit TROTMAN, another JetBlue employee, and DUNKLEY, a Delta employee, to participate in the cash smuggling scheme.

9. It was the object of the conspiracy for each of the DEFENDANTS to use his individual airport security clearance to circumvent TSA security checkpoints and to smuggle large amounts of cash, (which were represented to be drug proceeds that were to be used to further promote narcotics trafficking), from a non-secure area (*e.g.*, curbside passenger drop-off/pick-up or public restrooms near baggage claim) to a secure area of Logan (*e.g.*, passenger departure gates), in exchange for a cash payment from the CW.

10. It was a further object of the conspiracy for the DEFENDANTS to recruit additional airline employees to assist in the scheme so that: (i) it would be more difficult for TSA agents to detect the scheme through random checks, and (ii) the DEFENDANTS would be able to assist the CW in concealing and secretly transporting larger amounts of cash on the CW's behalf to the CW's purported drug trafficking organization in Florida.

11. From in or about August 2012 to in or about February 2014, the DEFENDANTS agreed to smuggle, and in fact, smuggled, a total of approximately \$417,000 in cash from non-

secure areas at Logan to secure airport areas of Logan by using their security clearance in order to circumvent TSA requirements and security checkpoints, and agreed to assist the CW in the CW's purported money laundering and interstate drug trafficking activities.

### **THE MANNER AND MEANS OF THE CONSPIRACY**

12. Each DEFENDANT knowingly assisted the CW to bypass the normal security TSA procedures, measures and requirements at Logan, including the functions performed by the TSA in examining persons, property and other articles entering an aircraft and the secure passenger area at Logan.

13. Specifically, and as explained in further detail below, one or more CO-CONSPIRATORS would meet the CW outside of Logan (*e.g.*, curbside) or at a public restroom located in an unsecure area of Logan (*e.g.*, the arrival baggage claim area), and obtain cash from the CW that the CW represented to be drug proceeds to be smuggled through Logan and transported to Florida. (The cash "drug proceeds" were actually U.S. currency funds provided by HSI to the CW.) After receiving the cash on the non-secure side of Logan, the CO-CONSPIRATOR would then conceal the cash on his person, and use his MassPort security badge, personal identification code, and biometric fingerprint clearance to proceed through an unmanned, locked door to enter a secure airport area of Logan. That CO-CONSPIRATOR would then deliver the concealed cash to the CW or another CO-CONSPIRATOR in the secure airport passenger area of Logan in exchange for a cash fee.

### **OVERT ACTS**

14. In furtherance of the conspiracy and to effect the objects thereof, the DEFENDANTS knowingly agreed to circumvent TSA security regulations and objectives at Logan for the purpose of concealing and transporting large amounts of cash represented as narcotics proceeds to be delivered to Florida. The following chart lists, in chronological order,



the relevant money laundering transactions and dates, the CO-CONSPIRATOR committing such overt acts, and the approximate dollar amount of the smuggled cash:

<b>Defendant(s)</b>	<b>Transaction Date</b>	<b>Amount of Cash Smuggled</b>
CROSSLEY	Aug. 28, 2012	\$35,000
LEACOCK	Oct. 14, 2012	\$57,000
LEACOCK	Dec. 11, 2012	\$50,000
CROSSLEY	Mar. 20, 2013	\$50,000
VICK	May 23, 2013	\$50,000
VICK & TROTMAN	July 24, 2013	\$25,000
VICK & TROTMAN	Sept. 5, 2013	\$50,000
VICK & DUNKLEY	Jan. 30, 2014	\$50,000
TROTMAN & DUNKLEY	Feb. 12, 2014	\$50,000
<b>TOTAL</b>		<b>\$417,000</b>

*A. The August 28, 2012 Transaction – CROSSLEY Smuggles \$35,000 in Cash*

15. On or about August 6, 2012, CROSSLEY met with the CW in Lynn, Massachusetts. During the meeting, which was consensually monitored and recorded under HSI's direction, the CW informed CROSSLEY that the CW needed to transport "dirty money" through Logan without detection by law enforcement authorities. The CW advised CROSSLEY that the CW would pay CROSSLEY \$2,000 for smuggling the cash and circumventing the TSA



checkpoint.

16. During this meeting, CROSSLEY advised the CW that it was unwise to conceal the cash in a bag at Logan because "...with a bag because they do ... it's random but they do random ... door checks. If they see you with a bag, they'll [check it]." Accordingly, CROSSLEY proposed to conceal the cash on his person.

17. During the same meeting, the CW asked CROSSLEY whether he knew anyone else interested in assisting the smuggling scheme. CROSSLEY stated: "I might know a few people ... a couple of them are out of town right now." The CW also reiterated to CROSSLEY that the CW was involved in a narcotics trafficking organization: "[T]he people I mess with, I mean, I've known them for a hot minute, but I mean when it comes to, you know, drug money, dude ... there ain't no trust, you know what I'm saying?" CROSSLEY responded: "Yeah."

18. On or about August 28, 2012, CROSSLEY met with the CW in Lynn, Massachusetts and traveled to Logan in the CW's vehicle. The meeting was consensually monitored at HSI's direction. During the meeting, the CW provided CROSSLEY with \$35,000 in cash and warned CROSSLEY not to lose any of the money because it belonged to a drug organization. The CW informed CROSSLEY that the CW needed to transport these cash proceeds to Florida to further promote the activities of the CW's purported drug trafficking organization. The CW also told CROSSLEY that CROSSLEY would receive his \$2,000 fee once CROSSLEY cleared the TSA checkpoint and met the CW in the secure passenger area of Logan to exchange the smuggled cash.

19. During the drive to Logan, CROSSLEY instructed the CW to meet him at a public restroom near the CW's departure gate for the CW's Florida flight at Logan. CROSSLEY further instructed the CW to use the handicap stall in the restroom and place an empty gym bag under the stall door. CROSSLEY informed the CW that once he recognized the gym bag,

CROSSLEY would enter the adjacent stall and hand the CW the smuggled cash underneath the stall dividers.

20. After CROSSLEY received the \$35,000 from the CW and hid the cash on his person, law enforcement officials observed, and Logan surveillance video recorded, CROSSLEY enter the secure airport areas of Logan using his MassPort security badge, personal identification code, and biometric fingerprint clearance to proceed through an unmanned, locked door; thereby effectively evading the TSA checkpoint and smuggling \$35,000 of purported drug proceeds into a secure area of Logan.

21. CROSSLEY then entered a restroom near the flight departure gates of Logan and occupied the stall next to the CW's. CROSSLEY handed the CW the \$35,000, and in return the CW handed CROSSLEY \$2,000 for smuggling the cash past the TSA checkpoint. After completing the transaction, the CW returned the \$35,000 to a law enforcement official and then boarded a JetBlue flight to Fort Lauderdale, Florida.

***B. The October 14, 2012 Transaction – LEACOCK Smuggles \$57,000 in Cash***

22. On or about August 28, 2012, CROSSLEY informed the CW during a consensually recorded telephone conversation that CROSSLEY had recruited another individual, later identified as LEACOCK, to join the cash smuggling conspiracy.

23. On or about September 26, 2012, CROSSLEY and LEACOCK met the CW in Revere, Massachusetts during a meeting that was consensually recorded under HSI's direction. During the meeting, and in reference to smuggling contraband, LEACOCK told the CW that LEACOCK "did this years ago."

24. During the conversation, the CW told LEACOCK that the CW could not "cross ... the security ... with drug money," and reminded CROSSLEY and LEACOCK that none of the cash could be lost because it represented narcotics proceeds. At the conclusion of the meeting,

LEACOCK and CROSSLEY agreed to smuggle the CW's cash through Logan so the CW could transport such cash to Florida without TSA inspection.

25. On or about October 14, 2012, just outside of Logan Airport, during a meeting that was consensually recorded at HSI's direction, LEACOCK met the CW inside CW's car and took \$57,000 in cash from the CW, which the CW represented to LEACOCK as drug proceeds that would be used to promote drug trafficking. LEACOCK hid the cash on his person, exited the vehicle, and walked into Logan.

26. Thereafter, the CW entered Logan, cleared the TSA checkpoint, and walked to the pre-arranged meeting place – a stall inside a public restroom near the CW's departure gate for the CW's JetBlue flight to Florida. At about this time, Logan surveillance video captured LEACOCK entering the secure airport area of Logan by using his MassPort security badge, personal identification code, and biometric fingerprint clearance. LEACOCK then proceeded to the pre-arranged meeting place, occupied a stall next to the CW, passed \$57,000 to the CW under the partition, and then took \$2,500 in cash from the CW as his fee. After LEACOCK and the CW exited the restroom, the CW returned the \$57,000 to another law enforcement official, and the CW boarded a JetBlue flight to Florida.

***C. The December 11, 2012 Transaction – LEACOCK Smuggles \$50,000 in Cash***

27. On or about December 2, 2012, LEACOCK told the CW that December 11, 2012 would be LEACOCK's last day at Logan because LEACOCK was transferring to work at JetBlue at Fort Lauderdale International Airport. LEACOCK also provided the CW with the name and cellphone number of a potential JetBlue recruit named "VICK," who would be willing to join the cash smuggling operation at Logan.

28. On or about December 11, 2012, during a consensually recorded meeting at the direction of HSI, LEACOCK met the CW at a pre-arranged location – a restroom within Logan's

arrival baggage area (a non-secure airport area, not subject to TSA screening) – to conduct another cash smuggling transaction. Inside the restroom, LEACOCK accepted from the CW \$50,000 in cash, that was purported to be drug proceeds to be transported to Florida.

29. Thereafter, Logan surveillance video recorded LEACOCK entering the secure airport area of Logan by using his MassPort security badge, personal identification code, and his biometric fingerprint clearance to proceed to the CW's JetBlue departure gate for Florida. LEACOCK then met the CW inside a restroom near the departure gate, passed the \$50,000 in cash to the CW underneath a bathroom stall partition, and collected \$2,000 in cash from the CW as his fee. After LEACOCK and the CW exited the restroom, the CW returned the \$50,000 to another law enforcement official, and the CW boarded a JetBlue flight to Florida.

***D. The March 20, 2013 Transaction – CROSSLEY Smuggles \$50,000 in Cash***

30. On or about March 19, 2013, during a consensually recorded telephone call, CROSSLEY informed the CW that CROSSLEY could smuggle cash the following day, but CROSSLEY warned the CW: "Just a heads up ... I know they been beefing up security ... you know what I mean? Just keep a lookout 'cause definitely customs has been ... they been all over."

31. On or about March 20, 2013, during a consensually recorded transaction under HSI's direction, CROSSLEY met the CW at a pre-arranged location – a restroom within Logan's arrival baggage area (a non-secure airport area, not subject to TSA screening) – to conduct another cash smuggling transaction. Inside the restroom, CROSSLEY accepted \$50,000 in cash, which the CW had earlier represented to CROSSLEY as drug proceeds to be transported to Florida.

32. Law enforcement officials observed, and Logan surveillance video captured, CROSSLEY proceed to the secure airport area of the passenger terminal by using his MassPort

security badge, personal identification code, and biometric fingerprint clearance to enter through an unmanned, locked door. CROSSLEY then proceeded to the CW's JetBlue departure gate area to meet the CW inside a restroom. Inside the restroom, CROSSLEY passed \$50,000 to the CW underneath the bathroom stall partition, and the CW passed CROSSLEY \$2,000 as his fee for circumventing the TSA checkpoint. After CROSSLEY and the CW exited the restroom, the CW returned the \$50,000 to a law enforcement official, and the CW boarded a JetBlue flight to Florida.

***E. The May 23, 2013 Transaction – VICK Smuggles \$50,000 in Cash***

33. On or about December 10, 2012, during a consensually recorded meeting at the direction of HSI, VICK met with the CW at a parking lot outside of Logan. During the meeting, the CW explained to VICK that the CW could not pass through TSA security with cash because it was "dirty money," and explained that "the more money that goes down there, the more product that comes up here," meaning that the CW's purported drug trafficking organization needed to send drug proceeds down to Florida and other locations in order to purchase more drugs to be delivered to Boston.

34. During this meeting, the CW asked VICK: "How much money would you be willing to cross," to which VICK responded: "Whatever y'all comfortable with, you know what I mean. 'Cause I'm comfortable." VICK then described his familiarity with the operation as he stated: "So, you need me to, like, get a bag from you and bring it upstairs to, like, the bathroom?" Finally, VICK added that he would be willing to smuggle a firearm past TSA security for the CW, when VICK stated: "You want to test something out ... whatever you want to do .... We straight. You got a stick for me right now? We can do that, bro." The CW declined VICK's offer.

35. On or about May 9, 2013, during a consensually recorded meeting at HSI's

direction, VICK met the CW near Logan. VICK stated that he would do his part by putting “that shit [meaning the cash] in my pocket ... go through my regular way, break room and all that, then go upstairs ... meet you at another bathroom upstairs [meaning the JetBlue departure gate area of Logan].” During the conversation, the CW reminded VICK of the purported illegal source of the cash: “I’m a repeat it again ... this is drug money,” to which VICK replied: “You ain’t got to worry about that ... I’m fine with that.”

36. Towards the end of the meeting, the CW asked VICK if VICK knew of other airline employees willing “to pass loot through” to circumvent TSA security. VICK responded: “I know a few people, um, that should have no problem with it.” During this conversation, the CW also discussed the prospect of VICK flying with the smuggled cash to Florida.

37. On or about May 23, 2013, during a consensually recorded transaction under HSI’s direction, VICK met the CW at a pre-arranged location – a restroom within Logan’s arrival baggage area (a non-secure airport area, not subject to TSA screening) – to conduct a cash smuggling transaction. Inside the restroom, VICK accepted from the CW \$50,000 in cash, which the CW had earlier represented to VICK as drug proceeds to be transported to Florida.

38. Law enforcement officials observed, and Logan surveillance video captured, VICK proceed to the secure airport area of the passenger terminal by using his MassPort security badge, personal identification code, and biometric fingerprint clearance to enter an unmanned, locked door. VICK then proceeded to the CW’s JetBlue departure gate area to meet the CW inside a restroom. Inside the restroom, VICK passed \$50,000 to the CW underneath the bathroom stall partition, and the CW passed VICK \$2,000 as his fee for evading the TSA checkpoint. After VICK and the CW exited the restroom, the CW returned the \$50,000 to a law enforcement official, and the CW boarded a JetBlue flight to Florida.

***F. The July 24, 2013 Transaction – VICK & TROTMAN Smuggle \$25,000 in Cash***

39. On or about June 6, 2013, during a consensually recorded conversation, the CW asked VICK if VICK and others were ready to fly down to Florida with the cash. The CW stated: “[I]f we can catch up with ... your peoples or whatever. To see if we could take it ... you know what I’m saying? So then you could, um, you know ... start flying down there or whatever because right now I’m just way ... a little too busy.” VICK replied: “When do you want to start it up?” The CW and VICK then agreed to meet later with a potential recruit and discuss the logistics of the smuggling scheme.

40. On or about June 11, 2013, in Revere, Massachusetts, during a consensually recorded meeting at HSI’s direction, VICK introduced TROTMAN to the CW, and VICK informed the CW that VICK had talked to TROTMAN about the Logan cash smuggling scheme. The CW then informed TROTMAN that the cash to be transported through Logan was “straight drug money, [and] this ain’t nothing to [mess] around with,” to which TROTMAN responded: “No doubt.”

41. During this meeting, the CW asked TROTMAN if he was willing to fly the cash to Florida and TROTMAN said: “Yeah, if I have to ... I go to Florida all the time so ... it wouldn’t look weird.” The CW also reminded TROTMAN and VICK: “The more money that goes down there, the, the more drugs that come up here.”

42. On or about July 24, 2013, VICK and TROTMAN met with the CW inside the CW’s vehicle near the curbside pick-up at Logan. During this consensually recorded meeting at the direction of HSI, TROTMAN accepted from the CW \$25,000 in cash, which the CW represented as drug proceeds to be transported to Florida. The CW handed TROTMAN \$1,000 and VICK \$2,000 to smuggle the \$25,000 in cash through Logan for transport to Florida. The CW also instructed VICK that once VICK arrived in Florida, VICK was to deliver the \$25,000 in



cash to an individual (in reality, an HSI undercover agent, “UC1”), that the CW represented to VICK and TROTMAN as a member of the CW’s purported drug trafficking organization.

43. After this conversation, VICK and TROTMAN exited the vehicle and walked into Logan. Once inside Logan, TROTMAN secreted the \$25,000 cash on his person and proceeded to the secure airport area of the passenger terminal area to meet with the VICK. Law enforcement surveillance, as well as Logan security video, showed that TROTMAN used his MassPort security badge, personal identification code, and biometric fingerprint clearance to enter through a locked security door and enter the secure passenger terminal side, thereby bypassing the TSA checkpoint.

44. After VICK and TROTMAN met inside a restroom near the JetBlue departure gates, VICK boarded a JetBlue flight to Fort Lauderdale, Florida. Law enforcement officials also boarded the flight to continue their surveillance of VICK. After landing at Fort Lauderdale International Airport, VICK contacted each of the CW and UC1, and informed them that he had landed. VICK exited the airport and met with UC1 inside UC1’s vehicle. During this meeting, which was consensually recorded at HSI’s direction, VICK handed UC1 the \$25,000 in cash to complete the transaction.

***G. The September 5, 2013 Transaction – VICK & TROTMAN Smuggle \$50,000 in Cash***

45. On or about September 5, 2013, during a consensually recorded meeting at HSI’s direction, the CW met with VICK near the curbside pick-up area at Logan. During this meeting, VICK received from the CW \$50,000 in cash, which the CW represented as drug proceeds to be sent to Florida by VICK and TROTMAN to UC1. The CW then handed VICK \$3,000 as VICK’s and TROTMAN’s fee for smuggling the \$50,000 in cash through Logan to Florida.

46. After this conversation, law enforcement officials observed VICK meet with TROTMAN inside a restroom near the baggage claim area, an airport area not subject to TSA

screening. TROTMAN then proceeded with the \$50,000 cash secreted on his person to the secure airport area of the passenger terminal area to meet with the VICK. Law enforcement surveillance, as well as Logan security video, showed that TROTMAN used his MassPort security badge, personal identification code, and biometric fingerprint clearance to proceed through a locked security door and enter the secure passenger terminal side, thereby bypassing the TSA checkpoint.

47. After VICK and TROTMAN met inside a restroom near the JetBlue departure gates, VICK boarded a JetBlue flight to Fort Lauderdale, Florida. Law enforcement officials also boarded the flight to continue their surveillance of VICK. After landing at Fort Lauderdale International Airport, VICK contacted UC1, and met with UC1 inside UC1's vehicle. During this meeting, which was consensually recorded at HSI's direction, VICK handed UC1 the \$50,000 in cash to complete the transaction.

48. On or about October 7, 2013, during a consensually recorded conversation, the CW asked TROTMAN whether TROTMAN was willing to smuggle drugs – which the CW referred to as “birds” – that were transported to Logan. The CW said to TROTMAN: “Have you talked to VICK ... I talked to him last week to let him know ... something is coming up. I told him to run it by you so that ... if he is not working, then you can get it. ... What it is maybe a bird or two ... A bird or two will come up ... Are you cool with taking something out? Like taking a couple birds out, couple of keys ... it's going to be an obvious bright color with some type of off color tape ... I will let you know exactly what it will look like ... you guys just do what you gotta do.” TROTMAN responded: “Yeah, just have to let me know. Let me know exactly how it is going to move and then, I'll run it by VICK, and I am just going to go.”

***H. The January 30, 2014 Transaction – VICK & DUNKLEY Smuggle \$50,000 in Cash***

49. On or about January 6, 2014, inside a Logan parking lot, VICK introduced the CW to DUNKLEY. (VICK had previously offered to find additional airline employees to assist the CW's operation.) During this consensually recorded meeting, the CW explained the smuggling conspiracy to DUNKLEY by stating: "I'm gonna tell you what I do with ... with VICK and them boys [referring to the other CO-CONSPIRATORS] ... I'm gonna let you know what I do with them and what I'm about, and then you let me know what you want to do for me and what you can do for me .... Obviously, you know this is coke [meaning cocaine] money, you know what I mean?" DUNKLEY responded: "I know, I know."

50. The CW then repeated to DUNKLEY: "Obviously, it's drug money. So we can't ... we cannot, we cannot [mess] anything up. You know what I mean?" DUNKLEY replied, "I know." The CW then asked DUNKLEY: "Have you ... so you've done this before?" To which DUNKLEY responded: "I've done this ... I've flown with it."

51. DUNKLEY then asked the CW how the CW's cash smuggling scheme worked: "How do they usually do it? They put in on themselves and they just go down there or whatever?" The CW responded: "What we do is, I see VICK first thing in the morning, we meet up in a bathroom like in departures ... VICK goes in normal like he's going into work ... Okay so then, I go through upstairs and they search me and do all that and then once I crossover [pass the TSA security checkpoint] he meets me ... like in a bathroom. You know what I mean?" DUNKLEY replied: "Yeah, yeah, yeah."

52. The CW then informed DUNKLEY that DUNKLEY would receive a fee for smuggling cash past TSA security, and the CW added: "I'm happy with what you can do for me ... I know you'll be happy with ... with the, uh, end result as far as moneywise .... Let's get it man. Welcome, welcome, welcome, you know what I mean?" DUNKLEY then replied: "Let's

go make money. You know what I'm saying? Let's make money ... ain't no thing. Let's make money together. Ain't no thing."

53. On or about January 30, 2014, DUNKLEY met the CW inside the CW's vehicle at the curbside pick-up area of Logan. During this consensually recorded meeting, DUNKLEY accepted from the CW \$50,000 in cash, which the CW represented as drug proceeds to be sent to Florida. In addition, the CW handed DUNKLEY \$1,000 in cash, along with an additional \$2,000 in cash for VICK, as payment for smuggling the cash through Logan's TSA security checkpoints. The CW also handed DUNKLEY an additional \$500 for VICK as a recruiting fee for introducing DUNKLEY. The CW then instructed DUNKLEY to have VICK deliver the \$50,000 to an individual in Florida (actually an HSI undercover agent, "UC2"), whom the CW represented to be a member of the CW's drug trafficking organization.

54. After this conversation, Logan video surveillance showed that DUNKLEY used his MassPort security badge, personal identification code, and his biometric fingerprint clearance to proceed through an unmanned, locked security door that permitted DUNKLEY to bypass the Logan TSA checkpoint.

55. Law enforcement officials then observed DUNKLEY meet with VICK at a restroom near the Delta departure gates, whereafter VICK boarded a Delta flight bound for Orlando, Florida. After landing at Orlando International Airport, VICK exited the airport and met with UC2 inside UC2's vehicle. During this consensually recorded meeting, VICK handed UC2 the \$50,000 in cash that DUNKLEY had received earlier from the CW at Logan.

***I. The February 12, 2014 Transaction – DUNKLEY & TROTMAN Smuggle \$50,000 in Cash***

56. On or about February 12, 2014, TROTMAN met the CW inside the CW's vehicle near the curbside pick-up area outside Logan. During this consensually recorded meeting, TROTMAN accepted from the CW approximately \$50,000 in cash, which the CW represented as drug proceeds. In addition, TROTMAN accepted \$1,000 from the CW as his fee for smuggling the cash through Logan's TSA security checkpoints. The CW then handed TROTMAN an additional \$1,000 in cash and stated: "One thousand for him [meaning DUNKLEY]" for transporting the \$50,000 to Florida. TROTMAN replied: "Give me some time to put these ... in my pants ... don't worry I got long-johns on." TROTMAN then exited the CW's vehicle and walked into Logan.

57. After entering Logan, law enforcement officers observed, and Logan video recorded, TROTMAN use his MassPort security badge, personal identification code and biometric fingerprint clearance to enter the secure airport area of Logan through an unmanned, locked security door. TROTMAN then proceeded to a restroom near the JetBlue departure gates, where TROTMAN met DUNKLEY.

58. After DUNKLEY and TROTMAN exited the restroom, DUNKLEY boarded a JetBlue flight to Fort Lauderdale, Florida. Upon landing at Fort Lauderdale, DUNKLEY contacted UC1, as per the CW's instructions, and agreed to meet UC1 in the garage parking lot at the airport. During a consensually recorded meeting inside UC1's car, DUNKLEY handed UC1 approximately \$50,000 in cash that TROTMAN had previously secreted past the Logan TSA security checkpoints.

### CONCLUSION

59. Based upon the above facts, there is probable cause to believe that Rupert CROSSLEY, Alvin LEACOCK, Eric VICK, Anthony TROTMAN, and Dino DUNKLEY, from in or about August 2012 through in or about February 2014, within the District of Massachusetts and elsewhere, committed (i) conspiracy to commit money laundering by conducting financial transactions for the purpose of promoting and carrying on narcotics trafficking and concealing and disguising cash believed to be the proceeds of illicit narcotics trafficking, in violation of 18 U.S.C. §§ 1956(h) and 1956(a)(3)(A) and (B); and (ii) conspiracy to defraud the United States, namely, the TSA, by entering Logan Airport areas with the intent to evade TSA security procedures, and with the intent to commit, in such airport areas, a felony, in violation of 18 U.S.C. § 371 and 49 U.S.C. §§ 46314(a) and (b)(2).

  
STEPHEN VALENTINE  
SPECIAL AGENT  
HOMELAND SECURITY INVESTIGATIONS

Sworn and subscribed to me this **May 27, 2014** day of May 2014.

  
JUDITH G. DEIN  
U.S. MAGISTRATE JUDGE  
U.S. DISTRICT COURT